

FILED	
CLERK, U.S. DISTRICT COURT	
07/30/2024	
CENTRAL DISTRICT OF CALIFORNIA	
BY: _____	L.K. DEPUTY

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16 UNITED STATES OF AMERICA

17 UNITED STATES DISTRICT COURT

18 FOR THE CENTRAL DISTRICT OF CALIFORNIA

19 UNITED STATES OF AMERICA,

20 CR 2:24-CR-00461-FMO

21 Plaintiff,

22 GOVERNMENT'S EX PARTE APPLICATION
23 FOR ORDER SEALING INDICTMENT AND
24 RELATED DOCUMENTS; DECLARATION OF
25 JENA A. MACCABE

26 **(UNDER SEAL)**

27 MIGUEL ANGEL AVILA,
28 aka "Fredo,"
aka "Quavo,"
aka "Marcos,"
aka "Papitas,"
OMAR AVILA SALMERON,
aka "Simón Hernández,"
aka "Andres,"
aka "El Palatero"
JOSE JAIME GARCIA,
aka "Pablo,"
aka "Sneaky,"
GABRIEL MICHEL BECERRA,
aka "Steven," and
JOSE ALFREDO MORENO GONZALEZ,

29 Defendants.

30 The government hereby applies ex parte for an order that the
31 indictment and any related documents in the above-titled case (except
32 the arrest warrants for the charged defendants) be kept under seal
33

1 until the government files a "Report Commencing Criminal Action" in
2 this matter.

3 This ex parte application is made pursuant to Federal Rule of
4 Criminal Procedure 6(e) (4) and is based on the attached declaration
5 of Jena A. MacCabe.

6 Dated: July 30, 2024 Respectfully submitted,

E. MARTIN ESTRADA
United States Attorney

MACK E. JENKINS
Assistant United States Attorney
Chief, Criminal Division

JENA A. MACCABE
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UNITED STATES OF AMERICA

DECLARATION OF JENA A. MACCABE

I, Jena A. MacCabe, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of United States v. MIGUEL ANGEL AVILA, et al., the indictment in which is being presented to a federal grand jury in the Central District of California on July 30, 2024.

2. The defendants charged in the above-captioned indictment have not been taken into custody on the charges contained in the indictment and have not been informed that they are being named as defendants in the indictment to be presented to the grand jury on July 30, 2024. The likelihood of apprehending one or more of the charged defendants might be jeopardized if the indictment in this case were made publicly available before the defendants are taken into custody on the indictment.

3. Accordingly, the government requests that the indictment and sealed documents in this case (except the arrest warrants) be sealed and remain so until one of the defendants is taken into custody on the charges contained in the indictment and the government files a "Report Commencing Criminal Action" in this matter.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on July 30, 2024.

TENA A MACCABE